
From: Mithun Mansinghani
Sent: Wednesday, January 12, 2022 9:31 AM
To: Stronski, James
Cc: Bryan Cleveland; Andy Ferguson; Zach West
Subject: RE: IV Team Leader

Jim: For the reasons given in our response to your prior motion to compel a deposition of the IV Team Leader (Doc. 381), we cannot agree to that request. However, we would be amenable to a written deposition response on the terms provided for in the Court's prior resolution of this issue (Doc. 382).

Mithun

-----Original Message-----

From: Stronski, James <JStronski@crowell.com>
Sent: Wednesday, January 12, 2022 7:32 AM
To: Mithun Mansinghani <mithun.mansinghani@oag.ok.gov>
Cc: Bryan Cleveland <bryan.cleveland@oag.ok.gov>; Andy Ferguson <andy.ferguson@oag.ok.gov>; Zach West <zach.west@oag.ok.gov>
Subject: [EXTERNAL] Re: IV Team Leader

Mithun,

In view of this, we request scheduling of an in-person deposition of the real IV Team leader. Please respond by 11 am as we intend to raise this situation and our request with the Court.

Regards,

Jim

Sent from my iPhone

On Jan 11, 2022, at 6:23 PM, Mithun Mansinghani <mithun.mansinghani@oag.ok.gov> wrote:

External Email

Jim: After Mr. Farris's testimony yesterday, you asked whether ODOC's current IV Team Leader was the same person that signed the John Doe declaration last January. Upon further inquiry, I learned today that that in fact the current IV Team Leader (who served during the John Grant and Stouffer executions, and plans on serving for all foreseeable executions) is in fact not the same individual as the person who signed the John Doe declaration last January.

Mithun Mansinghani
Solicitor General

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